

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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In the Matters of)	
)	
IP-Enabled Services)	WC Docket No. 04-36
)	
Implementation of Sections 255 and)	
251(a)(2) of The Communications Act of)	WT Docket No. 96-198
1934, as Enacted by The)	
Telecommunications Act of 1996:)	
Access to Telecommunications Service,)	
Telecommunications Equipment and)	
Customer Premises Equipment by)	
Persons with Disabilities)	CG Docket No. 03-123
)	
Telecommunications Relay Services and)	
Speech-to-Speech Services for)	
Individuals with Hearing and Speech)	CC Docket No. 92-105
Disabilities)	
)	
The Use of N11 Codes and Other		
Abbreviated Dialing Arrangements		

COMMENTS OF NENA

The National Emergency Number Association (“NENA”) is pleased to respond to the Order and Public Notice Seeking Comment (“Order”) in the captioned proceeding.¹ At the outset, we appreciate the Order’s requirement (§15) that

interconnected VOIP providers and traditional TRS providers . . . remind individuals with hearing or speech disabilities to dial 911 directly (as a text-to-text, TTY-to-TTY call) in an emergency, whether using a PSTN-based service or interconnected VOIP service, rather than making a TRS call via 711 in an emergency.

9-1-1 was formally established as the universal emergency telephone number by the

¹ DA 07-4178, released October 9, 2007; 72 Federal Register 61813, November 1, 2007.

Wireless Communications and Public Safety Act of 1999². The use of such number should be available and used for all emergencies regardless of whether the caller is a hearing or deaf/hard of hearing individual.

It is NENA's hope and expectation that Next Generation 9-1-1 ("NG9-1-1") advancements will enable direct access to Public Safety Answering Points ("PSAPs") by all services used by the deaf and hard of hearing (both voice and non-voice communications) beyond just the current TTY capabilities. Such access will include direct access to 9-1-1 for video and IP relay services, text messaging and other similar services.³ Transitionally, we continue to encourage direct access to the 9-1-1 network wherever possible.⁴

At ¶16, the Notice asks about "technical solutions [allowing] interconnected VOIP providers to route all 711 calls to an appropriate relay center" and the ability of a relay center to identify the appropriate PSAP to call when receiving an emergency call via 711 and an interconnected VOIP service.

Eight months ago, on the subject of 9-1-1 access by users of Video Relay Service ("VRS") and IP Relay Service ("IPRS"), NENA submitted the attached slide presentation in Docket 03-123, which is among the captioned proceedings here. The solution presented to the 9-1-1 challenge for VRS/IPRS also offers a solution to the

² Public Law 106-81, October 26, 1999, codified at 47 USC §251(e)(3).

³ <http://www.nena.org/pages/ContentList.asp?CTID=65>

⁴ NENA recognizes that for wireline and wireless services, TRS units and other call centers have not traditionally employed solutions that directly access the 9-1-1 system. However, we note that the telematics provider, OnStar, is currently enabling the routing of their emergency calls from their national call centers directly to the appropriate PSAP via the E9-1-1 system.

challenge faced by TRS providers when needing to route an emergency call to an appropriate PSAP. In the VRS/IPRS case, the first required step was to assign the VRS/IPRS user a standard telephone number⁵. Here, that step is unnecessary because a VOIP subscriber already has such a number. However, the second and subsequent steps, as well as the sequences of needed actions unrelated to number availability, are applicable here as they are to VRS/IPRS. Essentially, the TRS provider would configure its system for access to the registered location of the TRS caller, just as a VOIP provider knows the registered location of its customers. From that point on, the solution to routing the 711 caller to the appropriate PSAP would work essentially the same way a nomadic VoIP call is currently routed.

For the reasons amply described in the Order's grant of partial waivers, the process at this time must depend on self-registration of nomadic hard-of-hearing users when they move beyond the area of the relay center where they initially registered their telephone numbers. Of course, self-registration is essential today even for nomadic VOIP users whose hearing is not impaired.

NENA, APCO, NASNA, CTIA and the VON Coalition recently hosted a two-day meeting on automatic location of nomadic and mobile emergency callers. The issue is pending for VOIP services in Dockets 04-36 and 05-196 and for wireless

⁵ The VRS/IPRS presentation submitted in March of this year refers to a numbering solution requiring the use of URIs and the NPAC at slide 4. NENA is now aware that there are at least two competing positions on the numbering solution for VRS/IPRS users, one that uses the NPAC and one that does not. NENA takes no position here as to a preference. We do strongly advocate that a decision be made as soon as possible so that a numbering solution is established to enable effective 9-1-1 service for VRS/IPRS.

services in Dockets 94-102, 07-114 and others. The meeting made clear that there is no consensus yet on auto-location of VOIP callers to 9-1-1, but lots of activity and a willingness to work together among public safety and industry and standards organization representatives. When a consensus develops, the solution(s) will be as available to hard-of-hearing users as to others.

NENA recognizes the present difficulty for a TRS center, having received a call from a non-native VOIP number, to forward that call to the appropriate PSAP “automatically and immediately” even if the center knows the self-registered location of the caller. Employing a solution that routes the call directly to the appropriate PSAP using a VOIP-like E9-1-1 interface solution for a relatively small number of calls will be time consuming and at a cost not previously undertaken by TRS providers. Manual look-up of a PSAP corresponding to that location is also a possible solution and is also time-consuming and even subjective to a degree.⁶

Use of a VOIP-like E9-1-1 solution or preparation of automated ten digit PSAP databases – or purchase of services to support them – is not cheap, particularly in relation to the relatively low numbers of TRS calls requiring 9-1-1 forwarding. On the other hand, it would seem that interstate cost recovery under Section 64.604(c)(5) could defray such expenses, and that states should be willing to facilitate recovery of reasonable and prudent intrastate costs.

Conclusion. There is a technical solution currently available for VOIP users

⁶ NENA and other entities have compiled PSAP directories of varying characteristics. A national database of PSAPs and their corresponding jurisdictional boundaries are available for purchase by TRS providers.

making emergency calls through TRS centers, as explained above and in the attachment. We look forward to the views of other commenters.

Respectfully submitted,

NENA

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